423 W. EIGHTH STREET SUITE 400 KANSAS CITY, MISSOURI 64105 (816) 472-9000 • FAX (816) 472-5000 EMAIL ccke@aolcom 3 LAFAYETTE CENTER, SUITE 330 1155 21ST STREET, N.W. WASHINGTON, D.C. 20036-3308 (202) 861-0740 • FAX (202) 331-9841 EMAIL copcandc@us.net

PLEASE REPLY TO THE MISSOURI OFFICE

VIA FEDERAL EXPRESS

March 13, 1997

Ms. Dawn M. Odrowski
Office of the General Counsel
Federal Election Commission
999 E. Street, NW
Washington, D.C. 20463

Re: Subpoena to Produce Documents/Southern Education Counsel/MUR 3774

Dear Ms. Odrowski:

Enclosed please find written answers to the questions attached to your Order and Subpoena issued the 12th day of February, 1997.

If we can be of further assistance to you please do not hesitate to contact us.

Very truly/yours,

Greg B Lam

GBL:dl Encl.

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Federal Election Commission United States of America

INTERROGATORIES

1. Describe the type of business engaged in by Southern Education Counsel.

Southern Education Counsel is a professional fundraising organization.

2. Identify the officers, directors and chief executive officers of Southern Education Counsel in November 1994.

Directors:

Scott Pasch David Keezer

Officers:

Scott Pasch President
David Keezer Vice President
David Keezer Secretary
Scott Pasch Treasurer

3. Identify the current officers, directors and chief executive officers of Southern Education Counsel.

Directors:

Scott Pasch David Keezer

Officers:

Scott Pasch President
David Keezer Vice President
David Keezer Secretary
Scott Pasch Treasurer

4. Identify the clients(s) on whose behalf Southern Education Counsel made phone calls described in Attachment 1.

Southern Education Counsel does not have any records regarding any solicitation performed for U.S. Senate candidates in November 1994.

5. Identify all U.S. Senate candidates named in the phone calls made by Southern Education Counsel in 1994.

Southern Education Counsel does not have any records regarding any solicitation performed for U.S. Senate candidates.

Federal Election Commission United States of America

INTERROGATORIES

Page 2

6. Identify all officers, directors, employees or consultants of Southern Education Counsel who have knowledge of the phone calls described in Attachment 1.

There are no officers, directors, employees or consultants of Southern Education Counsel who have any records regarding any solicitation performed for U.S. Senate candidates in November 1994.

7. Identify the source of the list(s) used to make the phone calls described in Attachment 1.

Southern Education Counsel does not have any records regarding any solicitation performed for U.S. Senate candidates,